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Fill in this information to identify the case:

Debtor 1 Adam B Clark

Debtor 2 Melody S Clark

United States Bankruptcy Court for the: Western District of Pennsylvania

19-70338-JAD

Form 4100R

Response to Notice of Final Cure Payment

10/15

8

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1:

Mortgage Information

Name of creditor: U.S. Bank National Association, as Trustee, for Lehman ABS Court claim no.

Manufactured Housing Contract Trust 2002-A as serviced by NewRez (if known):

LLC d/b/a Shellpoint Mortgage Servicing

Last 4 digits of any number you use to identify the debtor's account: 2707

Property Address: 760 Red School House Road

Osceola Mills, PA 16666

Part: 2

Prepetition Default Payments

Check one:

[X] Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$<u>0.00</u>

Part 3:

Postpetition Mortgage Payment

Check one:

[X] Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) Is due on: 2024-09-01

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ <u>0.00</u>

b. Total fees, charges, expenses, escrow, and costs outstanding:

+(b) \$ <u>0.00</u>

c. Total. Add lines a and b.

(c) \$ <u>0.00</u>

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

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Debtor 1	Adam B Clark			Case number (if known)	19-70338-JAD
	First Name	Middle Name	Loot Name	, ,	<u> </u>

Part 4: **Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5:	Sign Here
The pers	son completing this response must sign it. The response must be filed as a supplement to the creditor's pro
Check the	appropriate box:
[] I am the	e creditor.
[X] I am tl	he creditor's authorized agent.
knowlede Sign and	under penalty of perjury that the information provided in this response is true and correct to the best of my ge, information, and reasonable belief. print your name and your title, if any, and state your address and telephone number if different from the notice address the proof of claim to which this response applies.
/s/ Jos	Shua I. Goldman 07/19/2024 Date
Print:	Joshua I. Goldman Title Authorized Agent for Creditor
Company	Padgett Law Group
lf different f	from the notice address listed on the proof of claim to which this response applies:
Address	6267 Old Water Oak Road, Suite 203
	Tallahassee FL, 32312

Email

Contact phone

(850) 422-2520

plginquiries@padgettlawgroup.com

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IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA
JOHNSTOWN DIVISION

In Re;

Adam B. Clark Case No.: 19-70338-JAD

Debtor(s) Chapter: 13

CERTIFICATE OF SERVICE

I, hereby certify that on 07/19/2024, a true and correct copy of the foregoing document was served via United States Mail with adequate prepaid postage and/or electronically via the Court's ECF system:

Service by U.S. First Class Mail

Debtor Adam B Clark 760 Red Schoolhouse Road Osceola Mills, PA 16666

Co-Debtor Melody S Clark 760 Red Schoolhouse Road Osceola Mills, PA 16666

By Electronic Mail

Attorney for Debtor Kenneth P. Seitz Law Offices of Kenny P. Seitz P.O. Box 211 Ligonier, PA 15658

Trustee Ronda J. Winnecour Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219

> /s/ Joshua I. Goldman Joshua I. Goldman